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8 Attorney for EDGAR VEYTIA

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF NEW YORK  
11 (HONORABLE CAROL BAGLEY AMON)

12 EDGAR VEYTIA,

13 Petitioner,

14 vs.

15 UNITED STATES OF AMERICA,

16 Respondent.

CASE NO. 17CR115-CBA

UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
TRAVERSE

17 **TO: UNITED STATES ATTORNEY SETH D. DUCHARME, ASSISTANT**  
18 **U.S. ATTORNEY RYAN C. HARRIS; ASISSTANT U. S. MICHAEL P.**  
19 **ROBOTTI.**

20 Petitioner Edgar Veytia ("Petitioner") respectfully requests a two-week  
21 extension to file Petitioner's Traverse in this matter. This request is made due to  
22 the difficulty counsel has had in communicating with Petitioner. Petitioner is  
23 currently housed at FCI Pekin in central Illinois. That facility is on a modified  
24 lockdown, and it took counsel more than three weeks to arrange a legal call with  
25 Petitioner. It is anticipated that counsel will have travel to FCI Pekin before the  
26 Traverse is filed to communicate with Petitioner and meaningfully get his input on  
27 the filing.

28 Counsel has contacted the government, and they have no objection to this  
request for a two-week extension.

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2 Date: February 28, 2022

Respectfully Submitted,

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4 /s/ JOHN D. KIRBY

5 John D. Kirby  
6 Attorney for Edgar Veytia  
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